

# **EXHIBIT C**

Amy A. Pines

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From: prinsl@eu.gtlaw.com  
Sent: Thursday, July 24, 2008 7:45 AM  
To: Amy A. Pines  
Cc: FiioleA@eu.gtlaw.com; Kurt Stitcher; David W. Porteous  
Subject: RE: HMET's Production - April 25, 2008.

Amy,

Further to our email-correspondence of yesterday, we confirm that HMET indeed submitted the so-called "Bookwork" as exhibit E-73 to their Statement of Reply, which they filed with the Haarlem Court on June 18, 2008. This means that not only HMET's production of July 25, 2008, but HMET's whole production in the US Discovery was submitted as a trial exhibit in the Dutch proceedings. This follows from point 1.4 of HMET's Statement of Reply:

"With regard to the exhibits submitted with this statement it can be remarked that, submitted as Exhibit E-73, is a Bookwork drawn up by HMET in which, almost exhaustingly, all financial administration is included on the one hand and amongst other structuring of growth or the turnover, input, marketing & PR efforts, corporate documents, and customer praise expressions are included on the other hand. Since, amongst other, in the further mentioned specialist report of Prof. Dr. J. Joling RA and Mrs. I.K. de Vries RA submitted as Exhibit E-74, this Bookwork is frequently referred to and it also becomes clear from the Bookwork in which manner HMET ran their company in the Mid-East, HMET considers it advisable to include this entire Bookwork in this procedure. In this statement, apart from a specific Exhibit, the relevant paragraphs of the Bookwork will also frequently be referred to for further substantiation of the argument."

Please note that this excerpt supports our position that HMET's production is not responsive to our document request, but consists of handpicked documents that only relate to HMET's positions in the Dutch proceedings. Also, to the extent that the "Bookwork" is responsive to our document request, it follows from the wording "almost exhaustingly" that HMET itself acknowledges that it did not produce all documents responsive to our request.

Best regards,

Laurens

Laurens Prins  
Advocaat

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